



February 14, 2014

California Coastal Commission
c/o Sea-Level Rise Work Group
45 Fremont Street, Suite 2000
San Francisco, CA 94105

VIA: EMAIL

To Whom It May Concern:

We are writing as the co-chairs of the California Coastal Sediment Management Workgroup (CSMW) to provide comments on the Commission's Draft Sea-Level Rise Policy Guidance. The CSMW is a collaborative taskforce consisting of federal, state, and local agencies and non-governmental organizations working to address California's coastal sediment management needs on a regional and system-wide basis. The goal of the CSMW is to reduce shoreline erosion and coastal storm damages, restore and protect beaches and other coastal environments by restoring natural sediment supply from rivers, impoundments and other sources to the coast, and optimizing the use of sediment from ports, harbors, and other opportunistic sources.

Comments

Table 13 (page 139): *General resources for information on beach, bluff and dune erosion-*

- CSMW has several postings relative to the subject, most notable their "California Beach Erosion Assessment Survey" which identifies numerous Beach Erosion Concern Areas (BECAs) throughout the state where beach erosion has been identified as of concern to some regional, state or federal entity

Table 16 (page 149): *Community Level Planning-*

- **Regional Sediment Management (RSM) Program/Description:** Suggested additional language "To be most effective, RSM will....protect and enhance coastal ecosystems and maintain safe access to beaches for recreational purposes ["

- General Comment: It might be helpful to the local community to understand that Coastal RSM Plans may have already been developed for the region within which the LCP may lie, and therefore the LCP could "support" (not "supporting") management activities identified by the Coastal RSM Plan. As currently written, the language gives the idea that each LCP would develop their own RSM Plan, perhaps this is the intent, but even if so the local RSM Plan would benefit from the regional RSM Plan



Table 18 (page 153) *Shoreline Management and Shore Protection Measures-*

- **Beach nourishment and replenishment**/Applicability: Section could include reference to CSMW website resources that could help with 'the LCP [establishing] criteria for design, construction and management of the nourishment area...'
- **Dredging Management**/Applicability: in the spirit of local RSM, recommend that the language be slightly altered to "'LCPs should facilitate delivery of clean sediment to nearby beaches identified in a RSM Plan applicable to the LCP area where sediment is needed'"
- **Maintenance or restoration of natural sand supply**/Applicability: Standards could also recognize that sea level rise will result in reduced gradients which could reduce transport capability, and promote avoidance of development in the river's flood plain as well as dam removal/sand bypassing

Thank you for the opportunity to provide comments. Please note that this letter does not preclude any CSMW partner agency or organization from submitting separate comments that address its regulatory obligations and mission. If you have any questions or concerns regarding this letter, please contact either CSMW's Sediment Master Plan Project Manager, Clif Davenport, at (707) 576-2986.

Sincerely,

A black rectangular box redacting the signature of Christopher Potter.

Christopher Potter
Co-chair, CSMW
California Natural Resources Agency

A black rectangular box redacting the signature of George Domurat.

George Domurat
Co-chair, CSMW
Chief, South Pacific Division
U.S. Army Corps of Engineers